

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et al.,

Plaintiffs,

v.

STANLEY TAYLOR, et al.,

Defendants

05-399-JJF- Civil Action No.

FILED

FEB - 1 2006

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

PLAINTIFFS REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34, Fed.R.Civ.P., the plaintiffs requests that the defendants produce the documents listed herein within 30 days, either by providing the plaintiffs with copies or by making available to plaintiffs for inspection and copying.

1. Any and all grievances, complaints, or other documents received by the defendants or their agents at Sussex Correctional Institution (SCI) concerning mistreatment of inmates by defendants Lt. Hennessy and Sgt. Mears, and any memoranda, investigation files, or other documents created in response to such documents, since January 1, 1990.

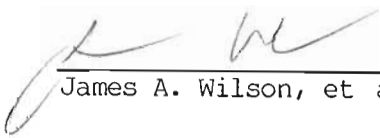
2. Any and all policies, directives, or instructions to staff concerning the use of tear gas or other chemical agents by SCI staff.

3. Any and all policies, directives, or instructions to staff concerning the use of force by SCI staff.

4. Any logs, lists, or other document reflecting grievances filed by SCI inmates from January 1, 1998 to date of response.

5. Any and all policies, directives, or instructions to staff in regards to classification to job placement or assignment.

DATE: 1/29/06


James A. Wilson, et al

I/M: JAMES A. WILSON, III, MERIT/EAST
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
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UNITED STATES DISTRICT COURT

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